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June 12, 2021

**By ECF**  
Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Michael Avenatti*, 19 Cr. 373 (PGG)

Your Honor:

I represent Michael Avenatti in the above-captioned case. We submitted a motion to compel on June 4 and the government responded in a seventeen-page, single-spaced letter filed at 11:36 pm last night. The government's letter raises a number of important legal and factual issues to address. I therefore respectfully request permission to file a reply no later than June 17.

Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman  
Benjamin Silverman  
Attorney for Michael Avenatti

cc: Counsel of Record (by ECF)